

James E. Cecchi
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: RIDDELL CONCUSSION
REDUCTION LITIGATION

Civil Action No. 13-7585 (JBS)(JS)

**DECLARATION OF
JAMES E. CECCHI**

This Document Relates To: ALL CASES

JAMES E. CECCHI, ESQ., of full age, hereby declares under penalty of perjury as follows:

1. I am an attorney licensed to practice in New Jersey and am a member of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. (“Carella Byrne”), co-counsel for Plaintiffs in the above captioned matter. In such capacity, I am fully familiar with the facts contained herein.
2. I was appointed Interim Co-Lead Counsel by this Court on April 10, 2014. Since that time, Carella Byrne, along with Wiggins Childs, have been actively involved in all aspects of this matter.
3. Attached hereto as **Exhibit 1** is a true and accurate copy of Plaintiffs’ Amended Consolidated Class Action Complaint and Jury Demand (“SAC”) (DE 45).
4. Attached hereto as **Exhibit 2** is a true and accurate copy of Plaintiffs’ Consolidated Complaint (DE 17).

5. Attached hereto as **Exhibit 3** is a true and accurate copy of Defendants' Second Amended Responses to Plaintiffs' Amended First Set of Interrogatories.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of the excerpts from the Deposition of Thad Ide.

7. Attached hereto as **Exhibit 5** is a true and accurate copy of the excerpts from the Deposition of Allison Chonko MacGregor;

8. Attached hereto as **Exhibit 6** is a true and accurate copy of the excerpts from the Deposition of Domenick Violi.

9. Attached hereto as **Exhibit 7** is a true and accurate copy of RIDDELL00002491.

10. Attached hereto as **Exhibit 8** is a true and accurate copy of Ex. 7 Deposition of Allison Chonko MacGregor.

11. Attached hereto as **Exhibit 9** is a true and accurate copy of document, 2008 Football Catalog (RIDDELL00090576 – RIDDELL00090625).

12. Attached hereto as **Exhibit 10** is a true and accurate copy of document, 2008 All-Sports Catalog (RIDDELL00090704 – RIDDELL00090880).

13. Attached hereto as **Exhibit 11** is a true and accurate copy of document, 2009 Football Catalog (RIDDELL00090912 – RIDDELL00091033).

14. Attached hereto as **Exhibit 12** is a true and accurate copy of document, 2010 Football Catalog (RIDDELL00091154 – RIDDELL00091173).

15. Attached hereto as **Exhibit 13** is a true and accurate copy of document, 2011 All-Sports Catalog (RIDDELL00091298 – RIDDELL00091509).

16. Attached hereto as **Exhibit 14** is a true and accurate copy of document, 2011 Football Catalog (RIDDELL00091510 – RIDDELL00091549).

17. Attached hereto as **Exhibit 15** is a true and accurate copy of document, 2012 Football-All-Sports Catalog (RIDDELL00091550-RIDDELL00091769).

18. Attached hereto as **Exhibit 16** is a true and accurate copy of Exhibit 10 to Deposition of Allison Chonko MacGregor (RIDDELL00011434 – RIDDELL00011442).

19. Attached hereto as **Exhibit 17** is a true and accurate copy of Exhibit 93 to Deposition of Thad Ide (RIDDELL00024345-RIDDELL00024346);

20. Attached hereto as **Exhibit 18** is a true and accurate copy of Exhibit 71 to Deposition of Thad Ide.

21. Attached hereto as **Exhibit 19** is a true and accurate copy of Exhibit 72 to Deposition of Thad Ide.

22. Attached hereto as **Exhibit 20** is a true and accurate copy of Exhibit 95 to Deposition of Thad Ide (RIDDELL00093011).

23. Attached hereto as **Exhibit 21** is a true and accurate copy of document, Introducing 2 New Helmets (RIDDELL-FTC-001002).

24. Attached hereto as **Exhibit 22** is a true and accurate copy of Exhibit 77 to Deposition of Thad Ide.

25. Attached hereto as **Exhibit 23** is a true and accurate copy of document, 2010 Hangtag (RIDDELL-FTC-001216-RIDDELL-FTC-001223).

26. Attached hereto as **Exhibit 24** is a true and accurate copy of Exhibit 79 to Deposition of Thad Ide.

27. Attached hereto as **Exhibit 25** is a true and accurate copy of Exhibit 92 to Deposition of Thad Ide.

28. Attached hereto as **Exhibit 26** is a true and accurate copy of Exhibit 97 to Deposition of Thad Ide (RIDDELL-FTC-000881-RIDDELL-FTC-000896).

29. Attached hereto as **Exhibit 27** is a true and accurate copy of excerpts from the Deposition of Allison Boersma.

30. Attached hereto as **Exhibit 28** is a true and accurate copy of Expert Report of Robert L. Klein of Applied Marketing Science, Inc.

31. Attached hereto as **Exhibit 29** is a true and accurate copy of Declaration and Expert Report of Robert Clark Cantu, M.D.

32. Attached hereto as **Exhibit 30** is a true and accurate copy of Declaration and Expert Report of Barry D. Jordan, M.D., M.P.H.

33. Attached hereto as **Exhibit 31** is a true and accurate copy of the excerpts from the Deposition of Tom Klepek.

34. Attached hereto as **Exhibit 32** is a true and accurate copy of Riddell Memo, dated September 14, 1998 (RIDDELL00101758-RIDDELL00101759).

35. Attached hereto as **Exhibit 33** is a true and accurate copy of RIDDELL00101748-RIDDELL00101757.

36. Attached hereto as **Exhibit 34** is a true and accurate copy of The Wisconsin Study.

37. Attached hereto as **Exhibit 35** is a true and accurate copy of Report of Aron Levko.

38. Attached hereto as **Exhibit 36** is a true and accurate copy of Expert Report of Charles Cowan of Analytic Focus, LLC.

39. Attached hereto as **Exhibit 37** is a true and accurate copy of Aronson's Supplemental Answers to Defendants' First Set of Interrogatories.

40. Attached hereto as **Exhibit 38** is a true and accurate copy of excerpts from the Deposition of Douglas Aronson.

41. Attached hereto as **Exhibit 39** is a true and accurate copy of excerpts from the Deposition of Denise Aronson.

42. Attached hereto as **Exhibit 40** is a true and accurate copy of Plaintiff Norma Thiel's Supplemental Answers to Defendants' First Set of Interrogatories.

43. Attached hereto as **Exhibit 41** is a true and accurate copy of excerpts from the Deposition of Norma Thiel.

44. Attached hereto as **Exhibit 42** is a true and accurate copy of Plaintiff Nicholas Farrell's Supplemental Answers to Defendants' First Set of Interrogatories.

45. Attached hereto as **Exhibit 43** is a true and accurate copy of excerpts from the Deposition of Nicholas Farrell.

46. Attached hereto as **Exhibit 44** is a true and accurate copy of Plaintiff Gustavo Galvan's Supplemental Answers to Defendants' First Set of Interrogatories.

47. Attached hereto as **Exhibit 45** is a true and accurate copy of Plaintiff Gustavo Galvan's Answers to Defendants' Second Set of Interrogatories.

48. Attached hereto as **Exhibit 46** is a true and accurate copy of excerpts from the Deposition of Gustavo Galvan.

49. Attached hereto as **Exhibit 47** is a true and accurate copy of Plaintiff Alliance Youth Sports Association's Second Supplemental Answers to Defendants' First Set of Interrogatories.

50. Attached hereto as **Exhibit 48** is a true and accurate copy of Plaintiff Alliance Youth Sports Association's Supplemental Answers to Defendants' First Set of Interrogatories.

51. Attached hereto as **Exhibit 49** is a true and accurate copy of Defendants' spreadsheet compiling unit sales data per state, per class period.

52. Attached hereto as **Exhibit 50** is a true and accurate copy of the Court's Order (DE 16), dated April 10, 2014, appointing James E. Cecchi and Dennis G. Pantazis as Interim Co-Lead Class Counsel.

53. Attached hereto as **Exhibit 51** is a true and accurate copy of the Proposed Trial Plan.

54. Attached hereto as **Exhibit 52** is a true and accurate copy of a Chart Comparing New Jersey, California, Florida and Arizona.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge.

/s/ James E. Cecchi
James E. Cecchi

Dated: December 7, 2016